

Application No.: 09/829737

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REMARKS

Upon entry of this paper, no claims are amended. Hence, claims 1-23 are pending, of which claims 1, 4, 11, 17, and 21 are independent. Applicant respectfully submits that the pending claims define over the art of record.

Rejection of Claims Under 35 U.S.C. §102(b)

Claims 1, 2, 4, 5, 8, 9, 11-13, and 16-20 are rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent No. 6,012,090 to Chung et al. (hereafter "Chung"). Applicant respectfully submits that Chung does not disclose the limitation of *a web page with a first and second embedded software facility, said first embedded software facility including a reference to a source of computer-executable code for determining a trust proxy setting* in a web browser, said second embedded software facility including a reference to a source of computer executable code, as required by independent claims 1, 4, 11, 17, and 21 and their dependent claims.

The Examiner's response to the last amendment on page 11 of the Office Action argues that Chung shows the step of determining a trust proxy setting as shown in Fig. 3, Proxy setting 138 in browser 106, and col. 11, lines 11-30. Applicant respectfully submits that the words "proxy setting" do not appear in col. 11, lines 11-30. Furthermore, Applicant respectfully submits that although Chung shows a proxy setting 138 in Fig. 3, it is not the same as a trust proxy setting of the claimed invention. In the present application, Applicant defines the trust proxy setting as "the setting enabling the web browser to accept the results of the proxy textual name equivalence conversion". See Page 4, first paragraph. Therefore, this definition of trust proxy setting should be used to interpret the claim language, and not any proxy setting. See MPEP 2111.01. Therefore, Applicant respectfully submits that the Examiner fails to provide sufficient showing that Chung discloses the limitation of *determining a trust proxy setting*. The mere existence of a proxy setting is not an equivalence of a limitation of *determining a proxy setting*. Additionally, Applicants respectfully submit that in the present application, determining a trust proxy setting means checking if the trust proxy setting is enabled. Therefore, although Chung discloses manually setting a proxy setting at Col. 10, lines 17-19, Applicant respectfully submits that setting a proxy setting is not an equivalence of determining a proxy setting. Additionally, Applicant respectfully submits that there are many proxy settings, and Chung does

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not specify what proxy setting 138 is. Therefore, even if manually setting a proxy setting is equivalent to determining a proxy setting, Applicant respectfully submits that Chung does not disclose the limitation of determining a *trust proxy setting*.

Additionally, Chung does not disclose the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser. Chung discusses an access applet and a registration applet. However, neither of them has a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser. Furthermore, Chung does not disclose the limitation of a *web page* with a first and second embedded software facility. The access applet and the registration applet are both on a client as shown in Fig. 3 and not included in a *web page*.

Accordingly, Applicant respectfully submits that Chung does not teach or suggest the limitation of a *web page* with a first and second embedded software facility, said first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, said second embedded software facility including a reference to a source of computer executable code, as required by independent claims 1, 4, 11, 17, and 21 and their dependent claims.

With respect to claims 2, 9, 16, 18, and 22, the Examiner argues on page 3 of the Office Action that Fig. 3 of Chung shows "first embedded software (Access Applet) is stored at a remote location from the web page 106". Applicant respectfully submits that reference 106 is used by Chung to refer to a *web browser application* and not a web page. See Chung Fig. 3 and related text. Applicant respectfully submits that a web browser application is not equivalent to a web page. Additionally, even if reference numeral 106 is used to refer to a web page, the access applet is not stored at a remote location from the web page, since both the web page and the access applet are stored on client 12, which is a single device such as a personal computer. See Chung Fig. 3. and Col 5, lines 21-22. One of ordinary skill in the art will understand that remote location means remote in physical location and not different in memory location within one memory device. As set forth above, Chung fails to disclose the limitation of a *web page* having a first and second embedded software facility and the limitation of the first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting*, therefore Chung cannot teach the limitation that the computer-executable code

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referenced by the first embedded software facility is stored at a remote location from the web page, as required by claims 2, 9, 16, 18, and 22.

As set forth above, Applicant respectfully requests that the Examiner reconsider and withdraw the rejection of claims 1, 2, 4, 5, 8, 9, 11-13, and 16-20.

Rejection of Claims 3, 10, 21-23 Under 35 U.S.C. §103(a)

Claims 3, 10, and 21-23 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chung in view of United States Patent No. 6,035,332 to Ingrassia, Jr. et al. (hereafter "Ingrassia"). Applicant respectfully submits that Chung and Ingrassia, either alone or in combination, do not teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by independent claims 1, 4, 11, 17, and 21 and their dependent claims.

As set forth above, Chung does not teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by independent claims 1, 4, 11, 17, and 21. Ingrassia fails to cure the deficiency of Chung. Nowhere does Ingrassia mention any proxy setting. Ingrassia only mentions that it can track and synchronize user activities on all type of web pages, even the ones from proxy servers. Since Ingrassia's focus is tracking user activities on a web page, there is no motivation for one of ordinary skill in the art to modify the teachings of Ingrassia to include an embedded software facility in a webpage to determine a trust proxy setting, which is not related to tracking user activities on a web page. Ingrassia also does not mention a source of *computer-executable code for determining a trust proxy setting*. Therefore, Applicant respectfully submits that Ingrassia does not teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by independent claims 1, 4, 11, 17, and 21. Hence, the combination of Chung and Ingrassia fails to teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by claims 3, 10, and 21-23.

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With respect to claims 3, 10, and 23, the Examiner agrees that Chung does not teach the limitation of the computer-executable code referenced by the second embedded software facility is stored at a remote location from the web page. The Examiner cited Ingrassia to teach this limitation in Fig. 2 with reference numeral 104K with second ID applet. Applicant respectfully disagrees.

One of ordinary skill in the art will appreciate that when a web page is requested from a browser application, the web page with its contents are downloaded and loaded into local memory of the electronic device where the browser application resides so that the browser application may render the web page with its contents. When the web page includes an embedded software facility, such as an applet, the applet may be downloaded to the electronic device as well. In Ingrassia, sessionid applet 128K, dts applets 126K, and master applets 124K are downloaded to memory 115K because web browser 114K requested a web page that includes these applets. Therefore, these applets will be downloaded to memory 115K together with the web page. See Fig. 7, steps 706 and 708. Therefore, after the web page and the applets are downloaded, they are all stored in the same memory 115K. Furthermore, prior to the web browser requesting such a web page, web pages and applets for consumers are stored in consumer page repository 146 and web pages and applets for call center administration users are stored in administration page repository. See Col. 6, lines 4-12. Additionally, both consumer page repository and administration page repository are both stored in one location, hard disk unit 154. See Col. 4, lines 24-26. Therefore, Ingrassia does not teach or suggest the computer-executable code referenced by the second embedded software facility is stored at a remote location from the web page, as required by claims 3, 10, and 23.

Accordingly, Applicant respectfully submits that the combination of Chung and Ingrassia does not teach or suggest each and every limitation of claims 3, 10, and 21-23. Applicant respectfully requests that the Examiner reconsider and withdraw the rejection of claims 3, 10, and 21-23.

Rejection of Claims 6, 7, 14, and 15 under 35 U.S.C. §103(a)

Claims 6, 7, 14, and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chung and Ingrassia in view of United States Patent No. 6,366,949 to Hubert (hereafter

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"Hubert"). Applicant respectfully submits that the combination of Chung, Ingrassia and Hubert do not teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by independent claims 1, 4, 11, 17, and 21 and their dependent claims.


As set forth above, the combination of Chung and Ingrassia fails to teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser. Applicant respectfully submits that Hubert does not teach or suggest this limitation. Nowhere in Hubert mention the use of a proxy, therefore there is no motivation for Hubert to want to have any proxy setting, not to mention trust proxy setting. Furthermore, Hubert does not teach or suggest computer-executable code for determining a trust proxy setting. Accordingly, the combination of Chung, Ingrassia, and Hubert, does not teach or suggest the limitation of a first embedded software facility including a reference to a source of *computer-executable code for determining a trust proxy setting* in a web browser, as required by 6, 7, 14, and 15. Applicant respectfully requests that the Examiner reconsider and withdraw the rejection of claims 6, 7, 14, and 15.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-064 from which the undersigned is authorized to draw.

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Respectfully submitted,

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